## UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

Linda Tirado

Court File No. 0:20-cv-01338 (JRT/ECW)

Plaintiff,

VS.

City of Minneapolis; Minneapolis Chief of Police Medaria Arradondo *in his official capacity*; Minneapolis Police Lieutenant Robert Kroll, *in his official capacity*; Minnesota Department of Public Safety Commissioner John Harrington, *in his official capacity*, Minnesota State Patrol Colonel Matthew Langer, *in his official capacity*; and John Does 1-4, *in their official and individual capacities*.

STIPULATION TO EXTEND STATE DEFENDANTS' TIME TO RESPOND TO PLAINTIFF'S COMPLAINT

Defendants.

WHEREAS, Plaintiff filed the Complaint in this matter (ECF No. 1) on June 2, 2020 and served Minnesota Department of Public Safety Commissioner John Harrington and Minnesota State Patrol Colonel Matthew Langer ("State Defendants") on June 3, 2020;

WHEREAS, Plaintiff and State Defendants, through their undersigned counsel, hereby stipulate to entry of an Order extending the time for State Defendants to answer or otherwise respond to the Complaint until July 20, 2020; and

WHEREAS, by entering into this stipulation, Plaintiff and State Defendants further agree that State Defendants preserve, and nothing in this stipulation shall be deemed to waive, any and all defenses that may be asserted in this matter.

NOW, THEREFORE, Plaintiff and State Defendants respectfully request an Order from the Court entering the proposed Order Extend State Defendants' Time to Respond to Plaintiff's Complaint in its entirety.

NOW, THEREFORE, Plaintiff and State Defendants respectfully ask that the Court sign and enter the proposed Order to Extend State Defendants' Time To Respond to Plaintiff's Complaint.

SIGNATURES ON FOLLOWING PAGE

Dated: June 26, 2020

Dated: June 26, 2020

KEITH ELLISION Attorney General State of Minnesota

s/ John M. Baker

**GREENE ESPEL PLLP** 

Clifford M. Greene, Reg. No. 0037436 John M. Baker, Reg. No. 0174403 Davida S. McGhee, Reg. No. 0400175 222 S. Ninth Street, Suite 2200 Minneapolis, MN 55402 (612)373-0830 cgreene@greeneespel.com jbaker@greeneespel.com dwilliams@greeneespel.com

and

## SIDLEY AUSTIN LLP

Tai-Heng Cheng
Margaret Hope Allen
Patricia Butler
Kierstin S. Fowler
787 Seventh Avenue
New York, NY 10019
(212)839-5661
tcheng@sidley.com
margaret.allen@sidley.com
pbutler@sidley.com
kfowler@sidley.com

ATTORNEYS FOR PLAINTIFF LINDA TIRADO s/ Julianna F. Passe KATHRYN IVERSON LANDRUM (#0389424)

JULIANNA F. PASSE (#0397317)

445 Minnesota Street, Suite 1400 St. Paul, Minnesota 55101-2131 (651) 757-1189 (Voice) (651) 282-5932 (Fax) kathryn.landrum@ag.state.mn.us julianna.passe@ag.state.mn.us

ATTORNEYS FOR DEFENDANTS MINNESOTA DEPARTMENT OF PUBLIC SAFETY COMMISIONER JOHN HARRINGTON AND MINNESOTA STATE PATROL COLONEL MATTHEW LANGER, IN THEIR OFFICIAL CAPACITIES

#4737985-v1